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8 **UNITED STATES DISTRICT COURT**
9 **NORTHERN DISTRICT OF CALIFORNIA**
10 **SAN JOSE DIVISION**
11

12 UNITED STATES OF AMERICA,
13 Plaintiff,
14 v.
15 MOHAMMAD MAYSSAMI,
16 Defendant.

Case No. 5:07-cr-00760-RMW (PVT)

**APPLICATION FOR TRAVEL;
DECLARATION OF COUNSEL**

HON. PATRICIA V. TRUMBULL

17
18 Defendant Mohammad Mayssami hereby applies to this Court for an order authorizing his
19 departure from the State of California, and his travel to Las Vegas, Nevada, from December 21,
20 2007, to December 26, 2007, to attend a reunion of family members, relatives and siblings. It is
21 estimated that more than twenty (20) family members, relatives and siblings will attend the
22 reunion, and thus a number of hotel reservations are necessary. At this time, it is anticipated that
23 Mr. Mayssami will stay at the MGM Grand Las Vegas, 3799 Las Vegas Boulevard South,
24 Las Vegas, Nevada 89109, (702) 891-1111.

25 Undersigned counsel has discussed this request with two Pretrial Services officers,
26 including Mr. Jaime A. Carranza, (408) 535-5226, who is supervising Mr. Mayssami until
27 transfer to a Pretrial Services officer in San Diego. Mr. Carranza states that he has no objection
28 to the proposed travel request, provided he is informed should travel in fact occur.

1 Undersigned counsel has spoken with Assistant United States Attorney Gary G. Fry, who
2 has no objection to the proposed travel request.

3 This application is based upon this declaration of undersigned counsel, filed and served
4 herewith.

5 By signing and filing this application, I hereby declare under penalty of perjury that the
6 facts asserted in support of the request are true and correct.

7
8 Dated: December 18, 2007

Respectfully submitted,

9 MCKENNA LONG & ALDRIDGE LLP

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11 ROBERT S. BREWER, JR.

ROBERT J. LAUCLAN, JR.

12 Attorneys for Defendant MOHAMMAD MAYSSAMI

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1 U.S. v. Mohammad Mayssami
2 Case No. 5:07-cr-00760-RMW (PVT)

3 **CERTIFICATE OF SERVICE**

4 I hereby certify that a copy of the following document(s):

- 5 ▪ **APPLICATION FOR TRAVEL; DECLARATION OF COUNSEL; and**
6 ▪ **[PROPOSED] ORDER AUTHORIZING TRAVEL**

7 ☒ was served upon all counsel of record via CM/ECF as indicated/listed on the United States
8 District Court, Northern District of California's CM/ECF registered email list in the above-
referenced matter (as set forth below):

9 *Attorneys for Plaintiff*
10 *United States of America*

Gary G. Fry, Esq.
Assistant United States Attorney
United States Attorney's Office
150 Almaden Boulevard, Suite 900
San Jose, CA 95113
(408) 535-5061 / Fax (408) 535-5066
Gary.Fry@usdoj.gov

14 ☒ via personal service, overnight mail (VIA UPS Overnight), facsimile, first class mail or
15 e-mail, as indicated below:

16 *U.S. Pretrial Services Officer*

Jaime A. Carranza, Officer In Charge
U.S. Pretrial Services
Northern District of California
280 South First Street, Suite 1150
San Jose, CA 95113
Telephone: (408) 535-5226
Facsimile: (408) 535-5227

19 ***Via Facsimile and U.S. Mail***

21 Executed this 18th day of December, 2007, at San Diego, California.

23
24 
Jamie L. Hornsby

25 SD:22161708.1